

**UNITED STATES COURT OF APPEALS  
DISTRICT OF COLUMBIA CIRCUIT**

SHAWN MUSGRAVE,

Appellant,

v.

MARK WARNER, *et al.*,

Appellees.

Case No. 22-5252

\* \* \* \* \*

**APPELLANT’S CONSENT MOTION FOR ENLARGEMENT  
OF TIME WITHIN WHICH TO FILE OPENING BRIEF**

Appellant Shawn Musgrave (“Musgrave”), by and through undersigned counsel, respectfully moves this Court for a further three-week extension of the deadline for filing his Opening Brief, which is currently due 10 February 2023.

This Motion proposes the following briefing schedule:

- 3 March 2023 – Appellant’s Opening Brief
- 17 April 2023 – Appellees’ Opening Brief
- 19 May 2023 – Appellant’s Reply

Appellees consent to this motion.

Musgrave has good cause for this motion. The undersigned has been dealing with several illnesses (and accompanying school absences) for his young children and himself for several days and will not be able to complete work by Friday. He

would normally request a shorter extension in such circumstances, but he already has six filings due in the following two weeks, and so he is forced to propose a deadline on the other side of that period.

This is the third extension requested for this Brief.

Date: February 8, 2023

Respectfully submitted,

/s/ Kelly B. McClanahan  
Kelly B. McClanahan, Esq.  
D.C. Bar #984704  
National Security Counselors  
4702 Levada Terrace  
Rockville, MD 20853  
301-728-5908  
240-681-2189 fax  
[Kel@NationalSecurityLaw.org](mailto:Kel@NationalSecurityLaw.org)

*Counsel for Appellant*

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing filing contains 271 words, and was prepared in 14-point Times New Roman font using Microsoft Word 2016.

/s/ Kelly B. McClanahan  
Kelly B. McClanahan, Esq.